

COHEN & GREEN

May 6, 2021

Honorable Judge Lois Bloom
United States Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

By Electronic Filing.

**Re: Pending Motion in Case No. 1:19-cv-02170-EK-LB,
Rudler v. MLA Law Offices, LTD et al.**

Dear Judge Bloom:

As the Court may recall, my firm represents the Plaintiff in this case. Plaintiff's motion (ECF Nos. 84, 85, and 86) for attorneys' fees under the Settlement (ECF No. 82) and relevant law — and related to veil-piercing remedies — is pending before the Court.

I write for two reasons. First, since on fee applications, “current rates, rather than historical rates, should be applied in order to compensate for the delay in payment” (*LeBlanc-Sternberg v. Fletcher*, 143 F.3d 748, 764 (2d Cir. 1998)), and I have had reason to make some small but significant updates to my CV, I wanted to provide a current version. That version is attached. The relevant updates, in addition to a number of press pieces, are these: (1) a handful of awards (National LGBT Bar [40 Under 40 Award](#); Super Lawyers [2021 New York Metro Rising Star Award](#);¹ and a brief I authored being entered in the BriefCatch “[Hall of Fame](#)”) and (2) an [interdisciplinary paper](#) I am a co-lead author on was accepted for publication in the Columbia Human Rights Law Review in volume 53(1).² Additionally, there are also a handful of additional pieces of press coverage and speaking engagements, and I corrected my appearance in front of the Federal Bar Association to note that I was one of this year's keynote speakers. Since these updates might bear on my appropriate hourly rate, I wanted to place them before the Court.

Second, since I am writing already — and given the unusual way briefing on this motion wrapped up (*see generally*, ECF No. 86) — I wanted to confirm the motion ended up marked as fully submitted. To that end, if there is anything else the Court needs, I would be happy to provide it.

I thank the Court for its time and consideration, and am available to discuss if Your Honor desires, at the Court's convenience.

¹

² Austin A. Baker & J. Remy Green, *There is No Such Thing as a “Legal Name”: A Strange, Shared Delusion*, 53 Colum. Hum. Rts. L. Rev ____ (forthcoming 2021).



Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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Enclosure.

cc:

All parties by ECF.